



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

TM/AES/MPR  
F.#2013R00169

*271 Cadman Plaza East  
Brooklyn, New York 11201*

March 24, 2015

By ECF and FedEx

Donald Dennis DuBoulay, Esq.  
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New York, NY 10007

Kelley J. Sharkey, Esq.  
26 Court Street, Suite 2805  
Brooklyn, NY 11242

Re: United States v. Paul Rivera, et al.  
Criminal Docket No. 13-149 (S-3) (KAM)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, please find enclosed with this letter additional discovery in the above-referenced matter. This letter is intended to supplement the government's discovery letters dated April 2, 2013, May 17, 2013, August 20, 2013, October 2, 2013, November 8, 2013, March 21, 2014, April 11, 2014, May 30, 2014, July 2, 2014, August 22, 2014, September 5, 2014, September 7, 2014, December 23, 2014, January 30, 2015, February 20, 2015, March 9, 2015 and March 16, 2015. Please consider this letter to be the government's renewed request for reciprocal discovery.

On the enclosed DVD marked TF MAFIA DVD-28, please find copies of the following:

<b>Item</b>	<b>Bates Number/Identifier</b>
Records received from Sprint for phone number 917-642-6004	Records are contained in a folder with Bates number TFMAFIA 0019251
Records received from MetroPCS for phone number 347-942-2059	Records are contained in a folder with Bates number TFMAFIA 0019252
Headshot of a co-conspirator	TFMAFIA 0019253
Photographs of a co-conspirator	TFMAFIA 0019254-61

Item	Bates Number/Identifier
Photographs of TF tattoos on victim-witnesses and co-conspirators	TFMAFIA 0019262-83
Photographs of TF members	TFMAFIA 0019284-311
Photographs of defendant Rivera	TFMAFIA 0019312-26
Records received from the New York State Department of Corrections (redacted)	TFMAFIA 0019327-59

In addition, enclosed please find a DVD marked TFMAFIA DVD-29 that contains copies of items from defendant Rivera's hard drive that requested by defendant Garrett.

Finally, please be advised that the government intends to call an individual to provide expert testimony regarding money laundering, including the methods used to conceal funds. Additional information about the individual and his or her testimony will be disclosed by March 30, 2015, consistent with the Court's pre-trial order.

Please let us know if you have any questions.

Very truly yours,

LORETTA E. LYNCH  
United States Attorney

By: /s/ Alixandra E. Smith  
Alixandra E. Smith  
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Enclosures (TFMAFIA DVD-28, TFMAFIA DVD-29)

cc: Clerk of the Court (KAM) (by ECF) (without enclosures)